# VIRGINIA DEPARTMENT OF HEALTH Office of Licensure and Certification Staff Analysis

April 10, 2020

Novant Health UVA Health System Prince William Medical Center (3/31/2020)

Manassas, Virginia
Temporarily add 42 Beds at Novant Health UVA Health System Prince William Medical Center

#### **Hospital**

Novant Health UVA Health System Prince William Medical Center ("PWMC"), located in Manassas, Virginia, is owned and operated by Prince William Hospital, a Virginia non-stock, not-for-profit hospital also located in Manassas, Virginia and organized pursuant to Title 13.1, Chapter 10, Article 10 of the Code of Virginia. Prince William Hospital is a subsidiary of Prince William Health System, which is owned and operated by Novant Health UVA Health System. Novant Health UVA Health System is a joint venture between UVA Medical Center and Novant Health, Inc. PWMC is located in Planning District ("PD") 8, Health Planning Region ("HPR") II.

#### **Background**

On March 12, 2020, Governor Ralph Northam declared a state of emergency throughout Virginia in response to the coronavirus pandemic. Subsequent to this declared state of emergency, on March 20, 2020, Governor Northam signed Executive Order 52 (EO 52) providing that notwithstanding the provisions of Article 1.1 of Chapter 4 of Title 32.1 of the Code of Virginia the State Health Commissioner (Commissioner), at his discretion, may authorize any general hospital or nursing home to increase licensed bed capacity as determined necessary by the Commissioner to respond to increased demand for beds resulting from COVID-19. Such beds authorized by the Commissioner under EO 52 would, notwithstanding Virginia Code § 32.1-132, constitute licensed beds that do not require further approval or the issuance of a new license.

Per the 2018 data provided by Virginia Health Information, PWMC operates an inventory of 130 beds.

PWMC is taking all reasonable efforts to reduce inpatient census to free beds to respond to the COVID-19 crisis, including complying with the March 25, 2020 Order of Public Health Emergency 2. While current census is not known it is expected that it is considerably lower than the 75 bed average.

#### **Request**

PWMC cites an emergent need to expand bed capacity due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection. Specifically, PWMC requests

authorization to add temporarily 42 beds consisting of 20 medical/surgical beds and 22 intensive care unit ("ICU") beds. PWMC states that these beds represent the first steps in expanding capacity to support the expected surge in COVID-19 patients. The requested medical/surgical beds will be located in the Outpatient Infusion and Case Management and Bioengineering areas and the ICU beds will be located in the intensive critical care unit (ICCU), coronary care unit (CCU), and surgical care unit (SCU) areas. The resulting bed configuration at PWMC is shown in Table 1.

**Table 1: PWMC Requested Temporary Bed Inventory** 

Bed Type	Existing Beds	Requested Additional Beds	Resulting Available Beds
Adult ICU	11	22	33
Med/Surg	61	20	81
Obstetric	26	0	26
Psych Bed - Other Adult	32	0	32
Total	130	42	172

### **Considerations**

In determining whether a need exists for the requested additional bed capacity, the State Health Commissioner established the following factors for consideration, when applicable.

# 1. Ongoing efforts to increase the availability of existing beds, such as suspension of elective procedures:

PWMC has made assurances that, in an effort to free up existing capacity, and in compliance with the March 25, 2020 Order of Public Health Emergency 2, they have suspended all elective procedures that, if delayed, are not anticipated to cause harm to the patient. Additionally, PWMC has made significant efforts to transition as much care as is appropriate to virtual or telemedicine visits. Finally, PWMC has diverted obstetric patient volume from their sister hospital, Novant Health UVA Health System Haymarket Medical Center ("HMC"), to the larger obstetric unit at PWMC in order to free up a unit at HMC for use during the COVID-19 crisis. The 8 obstetric beds adjacent to the PWMC obstetric unit will be temporarily reclassified to obstetric beds in order to limit the comingling of sick patients with obstetric patients during the projected COVID-19 surge.

# 2. The availability of professional and ancillary staff to provide care in the additional beds:

PWMC has made assurances that it has the necessary professional staff to provide care in the additional beds. PWMC will redeploy staff members whose regular jobs have been impacted by the reduction or cessation of elective procedures and other services at the hospital. Moreover, PWMC has developed a centralized staffing pool that calls in additional services from both within and without the health system. Finally, PWMC is coordinating with local partners to ensure that staff childcare needs are addressed.

# 3. The availability of medical supplies and personal protection equipment in the facility:

PWMC has made assurances that it has sufficient access to available medical supplies and personal protection equipment in the facility. PWMC has modified their PPE utilization policies to conserve these supplies while ensuring the safety of patients, their families, and PWMC's staff and clinicians. PWMC is also working with their parent organizations, Novant Health and University of Virginia, as well as local, state, and federal bodies to access existing stock of PPE and to increase various supplies needs to support demand. PWMC is also accepting donations from the community to supplement their supply needs.

## 4. The specific plan for increasing bed capacity:

PWMC intends to place the requested medical/surgical beds in the Outpatient Infusion and Case Management and Bioengineering areas and the ICU beds in the ICCU, CCU, and SCU areas. At this time, the planned use of the beds is to supplement normal operations based on existing and projected increase in occupancy by COVID-19 patients.

## 5. Where the beds will be located and the life safety code considerations of the location:

PWMC will tailor their use of the spaces based on the acuity of patients that will be located in those areas, patient safety, egress, and other life safety concerns, such as sleeping suite requirements. Additionally, the proposed areas, which are located within the existing hospital, are already outfitted with medical gas headwalls that will meet patient needs. Moreover, the hospital has 100% sprinkler coverage and smoke detection coverage. Finally, PWMC has provided assurances that Life Safety Code size (number of occupants) limitations will not be exceeded.

# 6. The availability of beds at other community hospitals and nursing homes in the community:

Per the 2018 data provided by Virginia Health Information (VHI), there are 3,209 licensed inpatient beds in PD 8 of which 1,749 are medical surgical beds and 326 are intensive care unit beds. The overall bed capacity data does not inherently take into account the extent to which, due to the rapid rate of infection of COVID-19, how many new cases may arise, and thereby overwhelm PWMC's and the area's capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 8. PWMC's proposal increases their overall bed capacity by 32.3% and is a 1.3% increase in overall bed capacity in the planning district. More specifically, the request increases PWMC's ICU bed capacity by 200% and is a 6.7% increase in ICU bed capacity in the planning district.

### 7. Other alternatives to adding bed capacity:

As discussed, given that the applicant has already provided assurances that they have suspended all of elective procedures, as well as the difficulty in anticipating how many cases of COVID-19 may arise in PD 8, the addition of beds in space that is just coming online represents the best option. Moreover, PWMC's request will increase the efficacy of bed

utilization at other hospitals. The diverting of obstetrics patients from HMC to PWMC will free up 16 additional beds at HMC that will be used to treat COVID-19 patients.

### 8. The current state of COVID-19 in the community:

At the time of this writing, the Virginia Department of Health reports that Virginia has 4,509 cases of COVID-19, the illness caused by the virus, and 121 deaths. To date, the Centers for Disease Control and Prevention has confirmed 427,460 cases in the United States, with 14,696 deaths. Prince William Health District currently has reported 373 cases, with 1,134 more COVID-19 positive patients reported in the surrounding jurisdictions.

The Health Systems Agency of Northern Virginia ("HSANV") recommended approval of PWMC's request to add 42 beds. HSANV found PWMC's request is responsive to the intent and purpose of Executive Order 52 and that, among other considerations, the capacity changes proposed at Novant hospitals:

- 1. Relate directly to the objectives and provisions of Executive Order 52. The requests submitted are for temporary increases in adult medical-surgical beds and intensive care beds. The individual hospital requests provide the information specified in the Commissioner of Health's March 24, 2020 letter providing guidance to Virginia hospital and nursing home administrators in applying for temporary bed increases.
- 2. Collectively, the three Novant Health UVA Health System requests cover all of the system's hospitals in Virginia. They take advantage of space and capabilities in each facility that with relatively modest adjustments will permit more effective and efficient use of existing clinical space under exigent circumstances.
- 3. Call for what appear to be economically rational changes, e.g., recapturing medical-surgical bed space vacated or reserved as part of campus renovation and modernization projects, and consolidating inpatient obstetrics capacity at PWMC to permit the addition of a substantial number of medical-surgical beds at the Haymarket Medical Center.
- 4. Represent a critical first step in responding to community concerns and local medical care needs likely to arise during the unfolding COVID-19 epidemic.
- 5. The proposed expansions of PWMC would supplement similar temporary expansions of capacity requested for the five Inova Health System hospitals in PD 8.

Based on these considerations, and on the recognition that the beds requested are likely to be needed soon, HSANV recommended that PWMC's request be granted. DCOPN agrees with

<sup>&</sup>lt;sup>1</sup> http://www.vdh.virginia.gov/coronavirus/

<sup>&</sup>lt;sup>2</sup> https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/cases-in-us.html?CDC AA refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fcases-in-us.html

the HSANV recommendation for approval, concurs with, and adopts, the attached HSANV analysis.

# **DCOPN Findings and Conclusions**

PWMC proposes to temporarily add 42 beds consisting of 20 medical/surgical beds and 22 intensive care unit ("ICU") beds. PWMC states that these beds represent the first steps in expanding capacity to support the expected surge in COVID-19 patients. The requested medical/surgical beds will be located in the Outpatient Infusion and Case Management and Bioengineering areas and the ICU beds will be located in the ICCU, CCU, and SCU areas. DCOPN finds that, due to the sudden and overwhelming increase in acute care cases resulting from COVID-19 infection throughout the Commonwealth, that PWMC has an immediate need to temporarily add 42 beds. PWMC has demonstrated that the rapid rise in COVID-19 cases has created an emergent need for a temporary increase in bed capacity. In the absence of a temporary increase to bed capacity in the planning district, it is conceivable that the continued rise of COVID-19 cases could overwhelm the hospital's capacity to treat patients, thereby jeopardizing the quality of care for residents of PD 8, and limit the ability of health care providers adequately treat and limit the spread of the virus.

## **DCOPN Staff Recommendations**

The Division of Certificate of Public Need recommends the **approval** of Novant Health UVA Health System Prince William Medical Center request to add temporarily 42 beds at Novant Health UVA Health System Prince William Medical Center. DCOPN's recommendation is based on the following findings.

- 1. PWMC has demonstrated that, due to the reasonable expectation of a sudden and overwhelming increase in acute care patients resulting from COVID-19 infection, PWMC has an immediate need to temporarily add 42 licensed inpatient beds.
- 2. PWMC's plan for training and shifting ambulatory staff is a reasonable solution for staffing the additional beds.
- 3. PWMC's plan and ability to obtain equipment and supplies is reasonable within the confines of the current crisis.
- 4. PWMC's plan to expand bed capacity in existing hospital space assures patient safety is maintained from a fire and life safety code perspective.
- 5. The HSANV recommended approval of PWMC's request.